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F I L E D

Clerk of the Superior Court

APR 26 2005

By: K SANDOVAL, Deputy

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SOUTHERN CALIFORNIA GAS COMPANY and
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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO**

Coordination Proceeding Special Title
(Rule 1550(b))

NATURAL GAS ANTI-TRUST CASES I, II, III
& IV

[This Document Relates to The Southern
California Cases Only]

Case No. JCCP 4221-00000

(JCCP 4221-00019)

The Honorable Ronald S. Prager
Coordination Trial Judge

**JOINT STIPULATION BETWEEN
PLAINTIFF THUMS LONG BEACH
COMPANY AND DEFENDANTS SEMPRA
ENERGY, SOUTHERN CALIFORNIA GAS
COMPANY AND SAN DIEGO GAS &
ELECTRIC COMPANY RE MOTION TO
COMPEL DISCOVERY RESPONSES**

1 WHEREAS, Defendants Sempra Energy, Southern California Gas Company and San Diego
2 Gas & Electric Company (the "Sempra Defendants"), on the one hand, and Plaintiff THUMS Long
3 Beach Company ("THUMS"), on the other hand, have agreed to meet and confer over the written
4 discovery and document responses served by THUMS Long Beach Company on March 11, 2005 and
5 March 14, 2005;

6 WHEREAS, the statutory deadline for filing a motion to compel with respect to these
7 discovery responses is rapidly approaching; and

8 WHEREAS, the Sempra Defendants and THUMS wish to avoid a premature motion to
9 compel on issues that will likely be worked out between the parties without the need for Court
10 intervention;

11 The Sempra Defendants THUMS hereby stipulate as follows:

12 **STIPULATION**

13 The undersigned counsel for Plaintiff THUMS and the Sempra Defendants hereby stipulate
14 that:

15 1. The deadline for the Sempra Defendants to file a motion to compel further responses
16 to the written discovery responses of THUMS is hereby extended to May 31, 2005. This stipulation
17 pertains to: (a) *Plaintiff THUMS Long Beach Company's Responses and Objections to Defendants*
18 *Sempra Energy, Southern California Gas Company, and San Diego Gas & Electric's First Set of*
19 *Special Interrogatories*; (b) *Plaintiff THUMS Long Beach Company's Responses and Objections to*
20 *Defendants Sempra Energy, Southern California Gas Company, and San Diego Gas & Electric's*
21 *First Set of Document Requests*; (c) *Plaintiff THUMS Long Beach Company's Responses and*
22 *Objections to Defendants Sempra Energy, Southern California Gas Company, and San Diego Gas &*
23 *Electric's First Set of Form Interrogatories*; and (d) *Plaintiff THUMS Long Beach Company's*
24 *Responses and Objections to Defendants Sempra Energy, Southern California Gas Company, and*
25 *San Diego Gas & Electric's First Set of Requests for Admissions to THUMS.*

26 DATED: April 21, 2005

27 QUINN EMANUEL URQUHART
28 OLIVER & HEDGES, LLP

CHRISTOPHER TAYBACK

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RYAN G. BAKER

By: 
Ryan G. Baker

Attorneys for Plaintiff THUMS LONG BEACH
COMPANY

DATED: April 21, 2005

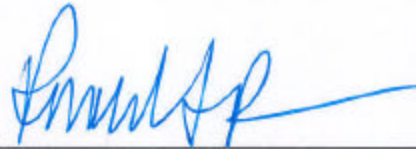
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By:  (MC)
James P. Fogelman

Attorneys for Defendants
SEMPRA ENERGY, SOUTHERN
CALIFORNIA GAS COMPANY and SAN
DIEGO GAS & ELECTRIC COMPANY

1
2 **IT IS SO ORDERED:**

3 DATED: APR 26 2005005



THE HONORABLE RONALD S. PRAGER
Coordination Trial Judge, Superior Court
San Diego County, State of California

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